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February 22, 2021

Via ECF

Judge Allyne R. Ross
United States District Court,
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: Leroy v. Mount Sinai, et al.
Docket: 20-cv-05325

Dear Judge Ross:

Please be advised that defendant Dr. Mira John was recently served via substitute service on February 10, 2021 within this matter. Our firm has been retained to represent her interests herein. During the events at issue, Dr. John was a resident at Mount Sinai Hospital, which our firm also represents. Please be advised that Dr. John formally joins in the removal from state court, as well as the pending motion in opposition to plaintiffs' motion to remand.

Yours, etc.,

AARONSON, RAPPAPORT, FEINSTEIN
& DEUTSCH, LLP

By: Larry D. Bloomstein
/s/ Larry D. Bloomstein (LB 0603)
(ldbloomstein@arfdlaw.com)
600 Third Avenue
New York, New York 10016
212-593-6700

Attorneys for Defendants

THE MOUNT SINAI HOSPITAL, s/h/a
MOUNT SINAI HOSPITAL, JILL
BERKIN, M.D., KEVIN TROY, M.D., and
HEATHER HUME, M.D.

cc: All parties via ECF

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

JEFFRY LEROY, as Co-Guardian of SILVIA LEROY, Incapacitated Person, SHIRLEY LICIN, as Co-Guardian of SILVIA LEROY, Incapacitated Person, and JEFFRY LEROY, Individually, Plaintiff, v. HEATHER HUME, M.D., MINDY BRITTNER, M.D., MIRA JOHN, M.D., MOUNT SINAI HOSPITAL, MARY TOUSSAINT-MILORD, M.D., KANIZ B. BANU, M.D., MAHREEN AKRAM, M.D., JAMIE CELESTIN-EDWARDS, CNM, BROOKDALE HOSPITAL MEDICAL CENTER, JILL BERKIN, M.D., and KEVIN TROY, M.D., Defendants.	Civil Action No. 1:20-cv-05325
NOTICE OF CONSENT AND JOINDER OF REMOVAL	

Defendant MIRA JOHN, M.D. (herein “Defendant”), by and through her undersigned counsel, files this Notice of Consent and Joinder of Removal, for the reasons set forth below.

I. INTRODUCTION

1. Defendant was served within the removed state court action via substitute service on February 10, 2021.

2. Defendant hereby joins in the Notice of Removal filed on behalf of Co-Defendants BROOKDALE HOSPITAL MEDICAL CENTER, MARY TOUSSAINT-MILORD, M.D., KANIZ B. BANU, M.D., MAHREEN AKRAM, M.D. and JAMIE CELESTIN-EDWARDS, CNM (herein “Brookdale Defendants”), dated November 3, 2020, for the reasons stated therein, as well as the “Notice of Consent and Joinder of Removal,” dated November 10, 2020 filed by

The Mount Sinai Hospital defendants, also represented by the undersigned. By consenting to and joining the above, Defendant hereby incorporates the arguments contained therein.

3. Defendant also joins the Pre-Motion Letter filed by The Mount Sinai Hospital defendants on November 10, 2020, as well as the pending motion practice in opposition to plaintiff's motion to remand, which is currently scheduled to be submitted to this Court on March 5, 2021.

WHEREFORE, Defendant hereby consents to and joins in the Notice of Removal filed November 3, 2020, on behalf of the Brookdale Defendants, the Notice of Consent and Joinder of Removal filed November 10, 2020 on behalf of the Mount Sinai defendants, the Pre-Motion Letter filed by The Mount Sinai defendants, as well as the pending motion practice in opposition to plaintiff's motion to remand.

Dated: New York, New York
February 22, 2021

Yours, etc.,

AARONSON, RAPPAPORT, FEINSTEIN &
DEUTSCH, LLP

By: **Larry D. Bloomstein** /s/
Larry D. Bloomstein (LB 0603)
(ldbloomstein@arfdlaw.com)

Attorneys for Defendants

THE MOUNT SINAI HOSPITAL, s/h/a MOUNT
SINAI HOSPITAL, JILL BERKIN, M.D., KEVIN
TROY, M.D., HEATHER HUME, M.D. and MIRA
JOHN, M.D.

cc: All parties via ECF